Kuehn, Ginny -KC-7

From: Dan/Barb Sisk [dbsisk@earthlink.net]
Sent: Wednesday, May 15, 2002 5:48 PM
To: comments@bpa.gov
Subject: Opposing Washington Winds Rattlesnake Mountain Wind Farm

I oppose the development of the Washington Winds Wind Farm on Rattlesnake Mountain. This development will be destructive to the unique and fragile environs of the Rattlesnake ridge.

Daniel R. Sisk
Registered Voter
Richland, WA
Benton County

May 15, 2002

Bonneville Power Administration
Public Affairs Department KC-7
P.O. Box 12999
Portland, OR 97212

Ref: Maiden wind Farm Draft Environmental Impact Statement

To the Administrator:

Thank you for providing The Nature Conservancy (The Conservancy) this opportunity to comment on the proposed action described in the above referenced document. The proposal clearly states the purpose for the project and distinguishes between the action and No Action alternatives. The legislative and market contexts for the project are also clearly set forth. The Conservancy has a regional presence in the area of the proposed action, brought about by the high biodiversity conservation needs determined through research and planning conducted over the last decade, described more fully below.

Introduction and Background
Key areas of interest to us in the proposed project area include the Hanford Reach National Monument and the Yakima Training Center. The Conservancy's identification of these priority areas comes in part from the Conservancy's Columbia Plateau Ecoregional assessment process. Based upon principles of conservation biology, our planning model yields a set of conservation areas representing biological diversity at varying biological and spatial scales. In addition to the Hanford Monument and Yakima Training Center, other private and federal ownerships harboring significant sources of remnant high quality plant communities are found within and in the vicinity of the proposed project.

In 1992 the U.S. Department of Energy (DOE) and the Conservancy entered into a Memorandum of Understanding that called for a cooperative and coordinated inventory of plants, animals and ecologically significant areas at Hanford. This study is noteworthy in its discovery of plant and insect species new to science. The following excerpt from the executive summary underscores the importance of this area within the Columbia Plateau ecoregion (*Biodiversity Inventory and Analysis of the Hanford Site*, TNC: 1999):

> Findings from the biodiversity inventory clearly demonstrate that the Hanford Site, including the Hanford Reach, is home to a spectacular, unduplicated and irreplaceable natural legacy. Within its mosaic of habitats, Hanford supports a wealth of relatively unaltered and increasingly uncommon native plant communities, the size and diversity of which is unmatched in the Columbia Basin. Not surprisingly, significant numbers of plants, insects, amphibians, reptiles, birds, and mammals, many of which are rare or declining in Washington, were found to be associated with or dependent on these habitats. In its present condition the Hanford Site is not only a refuge, but also a genetic bank for both the common and rare plants and animals that are integral components of the

> shrub-steppe and Columbia River ecosystems. From a conservation standpoint, the Hanford Site is a vital—and perhaps the single most important—link in preserving and sustaining the diverse plants and animals of the Columbia Basin Ecoregion.

The Yakima Training center is also a conservation priority for the Conservancy, within the constraints imposed by the mission needs of the Department of Defense. The Conservancy's report titled *Identifying and Preserving Biodiversity on a Regional Scale, the Role of the Yakima Training Center in Conserving Biodiversity in the Shrub-Steppe of Washington* (TNC, 1999) states that

> The YTC supports over 100,000 acres of high quality, native plant communities in seven major habitat types and more than 30 major cover types. Although many of these types are represented to a lesser degree on other public lands, the extent at the YTC of contiguous high quality, low elevation big sagebrush…is unique and of regional importance. The YTC supports 21 of the 77 rare plant taxa currently known in the region…Three taxa found on the YTC are not known elsewhere in Washington…

Comments

Given the exhaustively documented value of the region's remnant shrub-steppe environment, we would like to raise several points that emerge from the DEIS:

1. The DEIS contains cumulative impact analysis to site level impacts (pg 3-139. Para 3.17), a position that is not warranted given the stated need to produce a regional renewable power source, together with its transmission infrastructure (pg 1-4, para 1.2.3).
2. The lack of a regional cumulative impact analysis leads directly to the proposed site level impact mitigation strategy. Based on the Conservancy's research cited above, and other research cited in the DEIS, fragmentation of critical shrub-steppe matrix by conversion to development, and loss to introduction of invasive species requires mitigation at a sufficient scale. By not acknowledging the cumulative regional impact of other wind power proposals and transmission line facilities projects, the replacement actions will occur in an uncoordinated, piecemeal fashion. The end result of project-scale mitigation projects will be a fragmented patchwork of disjunct areas that will not serve as a functional landscape. In order for the remnant regional shrub-steppe matrix to function, large areas that still support ecosystem processes need to be conserved.
3. It is not clear how many total acres will be used to calculate required mitigation credits. The mitigation plan seems to devolve, for final resolution of uncertainty, to Benton County (pg 3-29, para 3.3.4.2). This means that Benton County will be responsible for resolving the acquisition strategy for project mitigation. It seems prudent to retain other representatives from the Site Management Plan (SMP) Team for cases of dispute resolution concerning key elements of mitigation, including the final acquisition formula.
4. The responsibility for implementing the acquisition of replacement property is not spelled out in the document. It is the Conservancy's experience that acquisition of private lands, particularly in conservative, rural areas, can be a difficult and time consuming effort, requiring specialized skills and institutional infrastructure. Without a definite, funded plan to dedicate skilled staff to this part of the mitigation plan, it will not be implemented. Given that possibility, what safeguards are offered against default of the mitigation plan? Although a monitor for the Site Management Plan is called for, what are the remedies for failure to act according to the SMP?

The comments given above point to the need to expand the Site Management Plan Team to include other professional stakeholders, to serve as an experts panel to develop an integrated mitigation plan. The need to address the potential to secure critical, meaningful habitat to offset other project impacts, as well as impacts from the current project proposal, is evident and timely as we collectively face the challenge of meeting the power demands of an expanding human population.

Comments prepared and submitted by:

Elizabeth Bloomfield
South Central Washington Program Manager